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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE ROGER T. BENITEZ)

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY;
STEVEN DESALVO, ASSISTANT UNITED STATES ATTORNEY;

PLEASE TAKE NOTICE that on June 2, 2008 at 2:00 p.m., Agustin Ramirez-Uribe, by and through his attorneys, Shaffy Moeel and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions:

- (1) compelling discovery and preservation of evidence; and
 - (2) granting leave to file further motions.

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These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: May 22, 2008

/s/ Shaffy Moeel
SHAFFY MOEEL
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Ramirez